

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In Re: The Ruins, LLC, Debtor.	Case No.: 25-30004 Chapter 11
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**DECLARATION OF TERRY STROH (T.L. STROH ARCHITECTS, LTD.)
CERTIFYING RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE
902(11)**

STATE OF Arizona)

) SS

COUNTY OF Maricopa)

Terry Stroh, pursuant to 28 U.S.C. § 1746, hereby certifies as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Certification. The evidence set out in this Certification is based on my personal knowledge.
2. I am the President of T.L. Stroh Architects, Ltd. (“Stroh”) located in Fargo, North Dakota and have been employed by Stroh for 36 years. Stroh provides architectural services.
3. I am the records custodian for Stroh.
4. Stroh was subpoenaed for records in the lawsuit *Red River State Bank v. The Ruins, LLC, et. al.*, Codington County Circuit Court, South Dakota, Case No. 14CIV24-68. Stroh responded to the subpoena and provided documents as requested.
5. I have personal knowledge of the construction of the 63-unit mid/high rise building located at 315 East Kemp Ave., Watertown, South Dakota (the “Ruins Project”). Stroh provided architectural services for the Ruins Project.
6. I have personal knowledge of the construction of the mixed-use building located at 26 1st Ave. Watertown, South Dakota (the “Generations Project”). Stroh provided architectural services for the Generations Project.

7. I have personal knowledge of the construction of the Parkside Place apartment building located at 8 2nd St NE, Watertown, South Dakota (the “Parkside Project”). Stroh provided architectural services for the Parkside Project.
8. True and correct copies of Stroh’s account statement and invoices for the Ruins Project are attached as Exhibit A.
9. True and correct copies of Stroh’s account statement and invoices for the Generations Project are attached as Exhibit B.
10. True and correct copies of Stroh’s account statement and invoices for the Parkside Project are attached as Exhibit C.
11. The documents attached as Exhibits A (Ruins Account Statement and Invoices), B (Generations Account Statement and Invoices), and C (Parkside Account Statement and Invoices) were made at or near the time of the events set forth therein by myself and other people with knowledge of those matters.
12. It was the regular practice of Stroh’s business activities to make the records attached as Exhibits A, B and C.
13. The records attached as Exhibits A, B, and C were kept in the regular course of business activity.
14. I certify under penalty of perjury that the foregoing is true and correct.

Executed on 22nd day of September, 2025.



Terry Stroh

Exhibit A
T.L. Stroh Architects, Ltd.

**The Ruins Project
Account Statement and Invoices**

9:52 AM
10/10/24

T.L. Stroh Architects, Ltd

All Transactions for Jesse Craig The Ruins 2021.07

All Transactions

Type	Num	Date	Account	Amount
Invoice	5254	09/06/2022	1200 · Accounts Rec...	21,550.00
Payment	141	05/12/2022	Bell Bank Savings	5,325.00
Invoice	5172	04/07/2022	1200 · Accounts Rec...	5,325.00
Payment	39334	03/14/2022	Bell Bank Savings	409,450.00
Invoice	5105	12/16/2021	1200 · Accounts Rec...	409,450.00
Total				



701.239.4198
701.239.9643

8 Seventh Street N Fargo ND 58102



September 1, 2022

Craig Development
PO Box 426
Fargo, ND 58107

*Re: The Ruins Apt Bldg - Watertown SD
Job #2021.07*

<i>Fixed Fee</i>	\$431,000.00
100% completed to date	\$431,000.00
Less amount billed to date	<u>-\$409,450.00</u>
Northern Tech Report (\$5,325 pd)	<u>\$0.00</u>
Total Amount Due	\$21,550.00

Please pay upon receipt.

Thank you.



701.239.4198
701.239.9643

8 Seventh Street N Fargo ND 58102



April 5, 2022

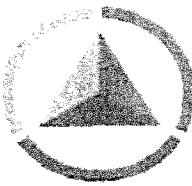
Craig Development
PO Box 426
Fargo, ND 58107

*Re: The Ruins Apt Bldg - Watertown SD
Job #2021.07*

<i>Fixed Fee</i>	\$431,000.00
95% completed to date	\$409,450.00
Less amount billed to date	<u>\$409,450.00</u>
Northern Tech Report	<u>\$5,325.00</u>
Total Amount Due	\$5,325.00

Please pay upon receipt.

Thank you.



NTI™
NORTHERN
TECHNOLOGIES, LLC

3522 4th Avenue South
Fargo, ND 58103
P: 701.232.1827 F: 701.232.7184
www.NTIgeo.com

INVOICE

Terry Stroh
TL Stroh Architects
8 7th St N
Fargo, ND 58102

March 27, 2020
Project No: 20.FGO09859.000
Invoice No: 34371
Due Date: April 26, 2020

Total Budget 5,000.00
Project 20.FGO09859.000 Ruins Development
Email Invoice to terrys@tlstroh.com

Geotechnical Exploration and Engineering Review

Fee		5,000.00
Taxes		
South Dakota State Tax	4.50 % of 5,000.00	225.00
Watertown Local Tax	2.00 % of 5,000.00	100.00
Total Taxes	325.00	325.00
PAYMENT DUE THIS INVOICE		\$5,325.00

Project Billings	Current	Prior	JTD Billings
	5,325.00	0.00	5,325.00

Project Manager Daniel Gibson

*Pab
TLA*



701.239.4198
701.239.9643

220 South 5th Street, Fargo, ND 58101



December 16, 2021

Craig Development
PO Box 426
Fargo, ND 58107

*Re: The Ruins Apt Bldg - Watertown SD
Job #2021.07*

<i>Fixed Fee</i>	\$431,000.00
95% completed to date	\$409,450.00
Less amount billed to date	<u>\$0.00</u>
Total Amount Due	\$409,450.00

Please pay upon receipt.

Thank you.

Exhibit B
T.L. Stroh Architects, Ltd.

**Generations Project
Account Statement and Invoices**

9:55 AM
10/10/24

T.L. Stroh Architects, Ltd

All Transactions for Jesse Craig Generations 2020.26

All Transactions

Type	Num	Date	Account	Amount
Payment	38198	06/23/2021	Alerus (savings)	52,500.00
Invoice	4916	05/13/2021	1200 · Accounts Rec...	52,500.00
Payment	37889	04/27/2021	Alerus (savings)	157,500.00
Payment	37704	03/16/2021	Alerus (savings)	87,500.00
Invoice	4839	02/04/2021	1200 · Accounts Rec...	157,500.00
Payment	37390	01/21/2021	Alerus (savings)	52,500.00
Invoice	4823	01/04/2021	1200 · Accounts Rec...	87,500.00
Invoice	4807	12/08/2020	1200 · Accounts Rec...	52,500.00
Credit Memo	4806	12/07/2020	1200 · Accounts Rec...	-5,000.00
Invoice	4668	06/05/2020	1200 · Accounts Rec...	5,000.00
Total				

May 5, 2021

Remit to: T.L. Stroh Architects, Ltd
8 Seventh St. N.
Fargo, ND 58102

Billing No. 4 (#2020.26) Generations

Craig Development
Box 426
Fargo, ND 58107

Billing for Architectural, & Engineering services:

Total Architectural & Engineering Fee:				
	Fixed Fee	of		\$350,000.00
Schematic Design	15%	x	\$350,000.00	\$52,500.00
Design Development	25%	x	\$350,000.00	\$87,500.00
Constr. Documents	45%	x	\$350,000.00	\$157,500.00
Bid/Neg.	15%	x	\$350,000.00	<u>\$52,500.00</u>
				\$350,000.00

Percentage Amounts Due this Request:

Schematic Design	100%	x	\$52,500.00	\$52,500.00
Design Development	100%	x	\$87,500.00	\$87,500.00
Constr. Documents	100%	x	\$157,500.00	\$157,500.00
Bid/Neg.	100%	x	\$52,500.00	<u>\$52,500.00</u>
Total				\$350,000.00
Less billed to date				-\$297,500.00
Subtotal				\$52,500.00

Additional Services:

Previous Amt Billed	\$0.00
Subtotal	\$0.00

Reimbursable Expenses:

Printing of Plans and Specs	\$0.00
Postage/shipping costs	\$0.00
Billed to Date	\$0.00
Subtotal	\$0.00

TOTAL AMOUNT DUE \$52,500.00

Total amount due within 15 days from date of statement.

701.230.4108
701.230.9645



2025 RELEASE UNDER E.O. 14176

February 3, 2021

Remit to: T.L. Stroh Architects, Ltd
8 Seventh St. N.
Fargo, ND 58102

Billing No. 3 (#2020.26) Generations

Craig Development
Box 426
Fargo, ND 58107

Billing for Architectural, & Engineering services:

Total Architectural & Engineering Fee:				
	Fixed Fee	of		\$350,000.00
Schematic Design	15%	x	\$350,000.00	\$52,500.00
Design Development	25%	x	\$350,000.00	\$87,500.00
Constr. Documents	45%	x	\$350,000.00	\$157,500.00
Big/Neg.	15%	x	\$350,000.00	\$52,500.00
				\$350,000.00

Percentage Amounts Due this Request:

Schematic Design	100%	x	\$52,500.00	\$52,500.00
Design Development	100%	x	\$87,500.00	\$87,500.00
Constr. Documents	100%	x	\$157,500.00	\$157,500.00
Bid/Neg.	0%	x	\$52,500.00	\$0.00
				\$297,500.00
				-\$140,000.00
Subtotal				\$157,500.00

Additional Services:

Previous Amt Billed	\$0.00
Subtotal	\$0.00

Reimbursable Expenses:

Printing of Plans and Specs	\$0.00
Postage/shipping costs	\$0.00
Billed to Date	\$0.00
Subtotal	\$0.00

TOTAL AMOUNT DUE \$157,500.00

Total amount due within 15 days from date of statement.



701.239.4198
701.239.9643

8 Seventh Street N Fargo, ND 58102



DO NOT FILE OR INDEX THIS DOCUMENT IN YOUR OFFICE

January 4, 2021

Remit to: T.L. Stroh Architects, Ltd
8 Seventh St. N.
Fargo, ND 58102

Billing No. 2 (#2020.26) Generations

Craig Development
Box 426
Fargo, ND 58107

Billing for Architectural, & Engineering services:

Total Architectural & Engineering Fee:				
	Fixed Fee	of	\$350,000.00	
Schematic Design	15%	x	\$350,000.00	\$52,500.00
Design Development	25%	x	\$350,000.00	\$87,500.00
Constr. Documents	45%	x	\$350,000.00	\$157,500.00
Big/Neg.	15%	x	\$350,000.00	\$52,500.00
				\$350,000.00

Percentage Amounts Due this Request:

Schematic Design	100%	x	\$52,500.00	\$52,500.00
Design Development	100%	x	\$87,500.00	\$87,500.00
Constr. Documents	0%	x	\$157,500.00	\$0.00
Bid/Neg.	0%	x	\$52,500.00	\$0.00
Total				\$140,000.00
Less billed to date				-\$52,500.00
Subtotal				\$87,500.00

Additional Services:

Previous Amt Billed	\$0.00
Subtotal	\$0.00

Reimbursable Expenses:

Printing of Plans and Specs	\$0.00
Postage/shipping costs	\$0.00
Billed to Date	\$0.00
Subtotal	\$0.00

TOTAL AMOUNT DUE \$87,500.00

Total amount due within 15 days from date of statement.



701.239.4198
701.239.9643

8 Seventh Street N Fargo, ND 58102



December 7, 2020

Remit to:
T.L. Stroh Architects, Ltd
8 Seventh St. N.
Fargo, ND 58102

Billing No. 1 (#2020.26) Generations

Craig Development
Box 426
Fargo, ND 58107

Billing for Architectural, & Engineering services:

Total Architectural & Engineering Fee:				
	Fixed Fee	of	\$350,000.00	
Schematic Design	15%	x	\$350,000.00	\$52,500.00
Design Development	25%	x	\$350,000.00	\$87,500.00
Constr. Documents	45%	x	\$350,000.00	\$157,500.00
Bid/Neg.	15%	x	\$350,000.00	\$52,500.00
				\$350,000.00

Percentage Amounts Due this Request:

Schematic Design	100%	x	\$52,500.00	\$52,500.00
Design Development	0%	x	\$87,500.00	\$0.00
Constr. Documents	0%	x	\$157,500.00	\$0.00
Bid/Neg.	0%	x	\$52,500.00	\$0.00
Total			\$52,500.00	
Less billed to date			\$0.00	
Subtotal				\$52,500.00

Additional Services:

Previous Amt Billed	\$0.00
Subtotal	\$0.00

Reimbursable Expenses:

Printing of Plans and Specs	\$0.00
Postage/shipping costs	\$0.00
Billed to Date	\$0.00
Subtotal	\$0.00

TOTAL AMOUNT DUE \$52,500.00

Total amount due within 15 days from date of statement.



701.239.4198
701.239.9643

8 Seventh Street N Fargo, ND 58102



Exhibit C
T.L. Stroh Architects, Ltd.

**Parkside Project
Account Statement and Invoices**

9:55 AM

10/10/24

All Transactions for Jesse Craig Watertown Parkside 2020.25**All Transactions**

Type	Num	Date	Account	Amount
Payment	37389	01/21/2021	Alerus (savings)	58,450.00
Payment	36928	11/03/2020	Alerus (savings)	66,800.00
Payment	36507	10/15/2020	Alerus (savings)	41,750.00
Invoice	4769	10/06/2020	1200 · Accounts Rec...	58,450.00
Invoice	4730	08/11/2020	1200 · Accounts Rec...	66,800.00
Invoice	4669	06/09/2020	1200 · Accounts Rec...	41,750.00
Total				



701.239.4198
701.239.9643

8 Seventh Street N Fargo, ND 58102



October 2, 2020

Craig Holdings
PO Box 426
Fargo, ND 58107

*Re: Watertown Parkside
(No Const Admin Services in Fee)
(Services in September)*

<i>Fixed Fee</i>	\$167,000.00
<i>100% completed to date</i>	\$167,000.00
<i>Less amount billed to date</i>	<u>-\$108,550.00</u>
Total Amount Due	\$58,450.00

Please pay upon receipt.

Thank you.

1-30 days	31-60 days	61-90 dys
	\$66,800.00	\$41,750.00



701.239.4198
701.239.9643

8 Seventh Street N Fargo, ND 58102



August 5, 2020

Craig Holdings
PO Box 426
Fargo, ND 58107

*Re: Watertown Parkside
Arch/Eng Services*

<i>Fixed Fee</i>	\$167,000.00
<i>65% completed to date</i>	\$108,550.00
<i>Less amount billed to date</i>	<u>-\$41,750.00</u>
Total Amount Due	\$66,800.00

Pd 11/3/20

Please pay upon receipt.

Thank you.

1-30 days	31-60 days	61-90 dys
		\$41,750.00



701.239.4198
701.239.9643

8 Seventh Street N Fargo, ND 58102



June 3, 2020

Craig Holdings
PO Box 426
Fargo, ND 58107

*Re: Watertown Parkside
Arch/Eng Services*

<i>Fixed Fee</i>	\$167,000.00
<i>25% completed to date</i>	\$41,750.00
<i>Less amount billed to date</i>	<u>\$0.00</u>
Total Amount Due	\$41,750.00

Please pay upon receipt.

Thank you.